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REDACTED FOR  
PUBLIC DISCLOSURE

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ARIZONA

United States of America,  
  
Plaintiff,  
  
vs.  
  
Anna Karen Flores,  
  
Defendant.

No. CR-24-1221-PHX-SPL (JZB)

**INDICTMENT**

VIO: 18 U.S.C. §§ 922(a)(6) and  
924(a)(2)  
(Material False Statement During the  
Purchase of a Firearm)  
Counts 1-5

18 U.S.C. §§ 924(d) and 981,  
21 U.S.C. §§ 853 and 881, and  
28 U.S.C. § 2461(c)  
(Forfeiture Allegation)

**THE GRAND JURY CHARGES:**

**COUNTS 1- 5**

On or about the dates listed below, in the District of Arizona, Defendant ANNA KAREN FLORES knowingly made false statements and representations in connection with the acquisition of a firearm to the businesses listed below, which were intended and likely to deceive the businesses as to a fact material to the lawfulness of a sale of a firearm by the business, each of which was licensed under the provisions of Chapter 44 of Title 18, United States Code, with respect to information required by the provisions of Chapter 44 of Title 18, United States Code, to be kept in the records of each listed business, in that

Defendant ANNA KAREN FLORES did execute a Department of Justice, Bureau of Alcohol, Tobacco, Firearms and Explosives Form 4473, Firearms Transaction Record, in each of the counts below stating she was the actual buyer or transferee of the firearm, and was not buying the firearm on behalf of another person, whereas in truth and fact, Defendant ANNA KAREN FLORES knew that she was buying the firearm on behalf of another person:

Count	Date	Business (FFL)
1	January 10, 2023	AV AZ Firearms (Phoenix, AZ)
2	January 20, 2023	AV AZ Firearms (Phoenix, AZ)
3	April 23, 2023	Arizona State Armory (Crossroads of the West Gun Show, Phoenix, AZ)
4	April 23, 2023	Grips By Larry (Crossroads of the West Gun Show, Phoenix, AZ)
5	April 23, 2023	Grips By Larry (Crossroads of the West Gun Show, Phoenix, AZ)

In violation of Title 18, United States Code, Sections 922(a)(6) and 924(a)(2).

### **FORFEITURE ALLEGATION**

The Grand Jury realleges and incorporates the allegations in Counts 1-5 of this Indictment, which are incorporated by reference as though fully set forth herein.

Pursuant to 18 U.S.C. §§ 924(d) and 981, 21 U.S.C. §§ 853 and 881, and 28 U.S.C. § 2461(c), and upon conviction of the offenses alleged in Counts 1-5 of this Indictment, the defendant shall forfeit to the United States of America all right, title, and interest in (a) any property constituting, or derived from, any proceeds the persons obtained, directly or indirectly, as the result of the offense, and (b) any of the defendant's property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, such offense as to which property the defendants is liable. If any forfeitable property, as a result of any act or omission of the defendant:

- (1) cannot be located upon the exercise of due diligence,
- (2) has been transferred or sold to, or deposited with, a third party,
- (3) has been placed beyond the jurisdiction of the court,

1 (4) has been substantially diminished in value, or  
2 (5) has been commingled with other property which cannot be divided  
3 without difficulty,  
4 it is the intent of the United States to seek forfeiture of any other property of said defendant  
5 up to the value of the above-described forfeitable property, pursuant to 21 U.S.C. § 853(p).

6 All in accordance with Title 18, United States Code, Sections 924(d) and 981, Title  
7 21, United States Code, Sections 853 and 881, Title 28, United States Code,  
8 Section 2461(c), and Rule 32.2, Federal Rules of Criminal Procedure.

9 A TRUE BILL

10  
11 /s/  
FOREPERSON OF THE GRAND JURY  
12 Date: July 16, 2024

13 GARY M. RESTAINO  
14 United States Attorney  
District of Arizona

15  
16 /s/  
SHEILA PHILLIPS  
17 Assistant U.S. Attorney